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7 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

8 JANE DOE, an Individual,
9
Plaintiff,

10 vs.

11 CITY OF LAS VEGAS, CITY OF
12 HENDERSON, NATHAN HANNIG, an
Individual, MARIO RUEDA, an Individual,
13 RUBEN SANCHEZ, an Individual, JAMES
SUAREZ, an Individual, JONATHAN
14 CUFF, an Individual, JOSEPH "JOE"
VANEK, an Individual,
15 JAROD BARTO, an Individual, CODY
RACINE, an Individual JASON TULLIS,
16 an Individual, and ZACH YEOMAN, an
Individual, WILLIAM MCDONALD, an
17 Individual, and as an Individual, JON
STEVENSON, an Individual, JOHN DOE
18 #1, likely an Individual, DOES I -X; ROE
CORPORATIONS I -X.

19 Defendants.
20

CASE NO.: 2:19-cv-00382-GMN-PAL

STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR
PLAINTIFF TO RESPOND TO
DEFENDANT CITY OF
HENDERSON'S MOTION TO
DISMISS AND FOR CITY OF
HENDERSON TO FILE A REPLY IN
SUPPORT OF ITS MOTION TO
DISMISS

(Second Request)

21 IT IS HEREBY STIPULATED by and between the parties hereto through their
22 respective attorneys that Plaintiff Jane Doe may have additional time within which to
23 submit Plaintiff's Opposition to Defendant City of Henderson's Motion to Dismiss
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1 Plaintiff's Complaint (Doc. #12) and that Defendant City of Henderson may have
2 additional time within which to submit the City's Reply in support of its Motion to
3 Dismiss.

4 1. Under the Federal Rules of Civil Procedure and Local Rule 7-2, Plaintiff's
5 Opposition was due April 11, 2019 and the City of Henderson's Reply would be due
6 seven days after service of the Opposition.

7 2. On April 4, 2019, Marta D. Kurshumova, counsel for Plaintiff, conferred
8 with Brian R. Reeve, counsel for Defendant City of Henderson, regarding the timing of
9 Plaintiff's Opposition and the City of Henderson's Reply. Counsel for the parties agreed
10 that Plaintiff could have until Friday, April 19, 2019 to file her Opposition and that the
11 City of Henderson could have 14 days from the service of the Opposition in which to
12 file a Reply brief.

13 3. On April 11, 2019, the Court granted the Stipulation for Extension of Time
14 (Doc. #26).

15 4. On April 17, 2019, Ms. Kurshumova, conferred with Kristina Gilmore,
16 counsel for Defendant City of Henderson, regarding the timing of Plaintiff's Opposition
17 and the City of Henderson's Reply. Counsel for the parties agreed that Plaintiff could
18 have until Wednesday, May 1, 2019, to file her Opposition and that the City of
19 Henderson could have 14 days (May 15, 2019) from the service of the Opposition in
20 which to file a Reply brief.

21 5. Good cause exists for this extension as Ms. Kurshumova only recently
22 returned to work after surgery. Further, the Parties have extended other filing deadlines,
23
24

1 including the date for the Early Neutral Evaluation Session due to the numerosity of the
2 Defendants.

3 4. The extension will not result in undue delay in the administration of this
4 case.

5 This document is being electronically filed through the Court's ECF System. In
6 this regard, counsel for Plaintiff hereby attests that (1) the content of this document is
7 acceptable to all persons required to sign the document; (2) Defendant's counsel has
8 concurred with the filing of this document; and (3) a record supporting this concurrence
9 is available for inspection or production if so ordered.
10

11 Dated: April 18, 2019

12 CITY OF HENDERSON

13 By: /s/Kristina Gilmore
14 Kristina Gilmore (# 11564)
15 Assistant City Attorney
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16 Henderson, Nevada 89015
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18 *Attorney for Defendant*
19 *City of Henderson*
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1 Dated: April 18, 2019

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3 By: /s/ Marta Kurshumova
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7 *Attorneys For Plaintiff*
8 *Jane Doe*

ORDER

IT IS HEREBY ORDERED:

That pursuant to the Stipulation agreed upon by both parties, the deadline for Plaintiff to respond to Defendant City of Henderson's Motion to Dismiss shall be extended to May 1, 2019. Defendant City of Henderson will have 14 days from the service of Plaintiff's Opposition within which to file a Reply brief.

DATED this 23 day of April, 2019.



Gloria M. Navarro, Chief Judge
UNITED STATES DISTRICT COURT